FEB 202014

## Annual 47 C.F.R. § 64.2009(e) CPNI Certification EB Docket 06-36

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Annual 64.2009(e) CPNI Certification for 2014 covering the prior calendar year 2013

1. Date filed: 2/12/14

2. Name of company(s) covered by this certification: OrbitCom, Inc.

3. Form 499 Filer ID: 824032

4. Name of signatory: Brad VanLeur

5. Title of signatory: President

6. Certification:

I, Brad VanLeur, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI

The company represents and warrants that the above certification is consistent with 47. C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed'

Brad VanLeur, President

Attachments: Accompanying Statement explaining CPNI procedures

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## Accompanying Statement of Michael Powers on behalf of OrbitCom, Inc.

OrbitCom has compiled written operating procedures which are in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules. The Commission's rules and OrbitCom's operating procedures implementing those rules are covered with each new employee, who has access to a customer's CPNI, when they are hired and all employees are covered at least once a year. The coverage includes the disciplinary measures that are applicable when a customer's CPNI is used without the proper approval. This coverage information is retained in the employee file.

OrbitCom's procedures mirror section 64.2001 *et seq.* of the Commission's rules and are updated as the Commission's rules are updated and modified and clarified as needed for employee understanding and performance.

OrbitCom has established a log to record any breaches discovered, notifications made to the United States Secret Service and the FBI and notifications made to customers. The log includes, if available, dates of discovery and notification, a detailed description of the CPNI that was the subject of the breach, and the circumstances of the breach. Provisions have been made to retain the record for a minimum of 2 years.

Signature

February 12, 2014

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Date